

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

**UNITED STATES OF AMERICA**

**v.**

**SHAUN BRIDGES**

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**CRIMINAL No.: 3:15-cr-00319-RS**

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**DEFENDANT BRIDGES' MOTION  
FOR EARLY TERMINATION OF ELECTRONIC MONITORING**

*Comes Now* Shaun Bridges, by and through his counsel, Steven H. Levin, and respectfully requests this Honorable Court enter an order directing the United States Probation Office to terminate electronic monitoring on Thursday, January 28, 2016. As grounds in support thereof, undersigned counsel states as follows:

- 1) The Bureau of Prisons has designated Mr. Bridges to the minimum-security camp at FCI Berlin, New Hampshire;
- 2) Mr. Bridges' reporting date to FCI Berlin is Friday, January 29, 2016, at 12:00pm;
- 3) FCI Berlin, New Hampshire, is located approximately 10 hours from Mr. Bridges' current residence in Maryland by car;
- 4) Mr. Bridges is currently on electronic monitoring, which the United States Probation Officer has advised will not cease—absent a court order—until Mr. Bridges' reporting date;
- 5) As a practical matter, Mr. Bridges cannot depart Maryland on January 29, 2016, and arrive at FCI Berlin by noon on that same day.
- 6) Mr. Bridges proposes the following itinerary, should this Court grant the motion:
  - a) On Thursday, January 28, 2016, at approximately 9:00am, Mr. Bridges' mother-in-law will drive him from his home to the United States Probation Office in Baltimore,

- ## CONCLUSION

/s/\_\_\_\_\_  
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*Pro Hac Vice*

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It is so ORDERED, this \_\_\_\_ day of January, 2016

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Judge Richard G. Seeborg  
United States District Judge  
Northern District of California